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12 WELLS FARGO BANK, N.A. d/b/a  
AMERICA'S SERVICING COMPANY  
13

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION**

16 BERNARD J. RHATIGAN, JR and ERIN E.  
RHATIGAN,

17 Plaintiffs,

18 vs.

19 EQUIFAX INFORMATION SERVICES,  
20 LLC; EXPERIAN INFORMATION  
SOLUTIONS, INC.; TRANS UNION, LLC;  
21 and WELLS FARGO BANK, N.A. d/b/a  
AMERICA'S SERVICING COMPANY,

22 Defendants.  
23

Case No. 3:14-cv-01037-JST  
Hon. Jon S. Tigar  
Ctrm. 9

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER RE COURT ISSUED  
DEPOSITION SUBPOENAS**

Action Filed: August 16, 2013  
Trial Date: June 1, 2015

1 IT IS HEREBY STIPULATED by and between Plaintiffs BERNARD J. RHATIGAN, JR  
2 and ERIN E. RHATIGAN ("Plaintiffs") and Defendant WELLS FARGO BANK, N.A. d/b/a  
3 AMERICA'S SERVICING COMPANY ("Wells Fargo") as follows:

4 1. Pursuant to 15 U.S.C. § 1681b(a)(1), Equifax, Inc., TransUnion LLC and Experian  
5 Services Corporation contend that they require a Court issued Subpoena before they will produce  
6 records which relate to the Plaintiffs.

7 2. Plaintiffs and Wells Fargo agree that it is in their mutual interest to obtain the records as  
8 specified in Exhibits 1-3, attached hereto.

9 3. Therefore, Plaintiffs and Wells Fargo hereby stipulate and respectfully request that this  
10 Court issue the Subpoenas for Records compelling production of the requested documents as set  
11 forth in Exhibits 1-3, attached hereto.

12 AGREED AS TO FORM AND CONTENT:

13 DATED: October 22, 2014

CONSUMER LITIGATION ASSOCIATES, P.C.

14  
15 By: /s/ Matthew J. Erausquin  
Matthew J. Erausquin, Esq.

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17 Attorneys for Plaintiffs Bernard J. Rhatigan, Jr. and Erin  
E. Rhatigan

18 DATED: October 22, 2014

SEVERSON & WERSON  
A Professional Corporation

19  
20 By: /s/ David A. Berkley  
David A. Berkley

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22 Attorneys for Defendant WELLS FARGO BANK, N.A.  
d/b/a AMERICA'S SERVICING COMPANY

23  
24 I, David A. Berkley, am the ECF user whose identification and password are being used to  
25 file this Stipulation. I hereby attest that Matthew Erausquin has concurred in this filing.

26  
27 /s/ David A. Berkley  
David A. Berkley

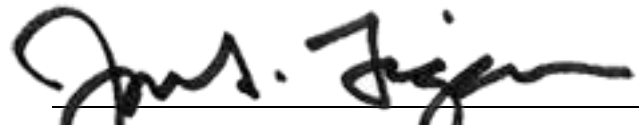
**[PROPOSED] ORDER**

The Court, having considered the Joint Stipulation for Court-Issued Deposition Subpoenas (“Stipulation”), and good cause existing because, in the absence of another permissible purpose, credit reporting agencies may only furnish consumer reports in response to the “order of a court” (15 U.S.C. §1681b(a)(1)), hereby:

**ORDERS:**

- ☒ Consumer reporting agencies Experian, Trans Union, and Equifax, are commanded to produce to Wells Fargo, and permit inspection or copying of, the documents and electronically stored information or objects contained in the subpoenas attached as Exhibits 1-3 to the Stipulation.

DATED: October 24, 2014

  
HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT  
COURT JUDGE